

No. 25-1162

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IN THE  
IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

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Ryan Dillon-Capps

*Plaintiff-Appellant,*

v.

Ohana Growth Partners, LLC et al.,

*Defendants-Appellees.*

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On Appeal from  
the U.S. District Court  
for the District of Maryland

No. 1:24-CV-3744

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Ryan Dillon-Capps Formal Notice of Historical Valuation-  
Based Settlement Offers, Reciprocal Relief, Consecutive-  
Compounding Multipliers, Continuing Violation Multiplier,  
and Opportunity to Negotiate

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## Notice

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### ATTENTION:

Miles & Stockbridge P.C.  
Ohana Growth Partners, LLC  
The State of Maryland  
The United States Government

### PLEASE TAKE NOTICE that:

On October 3, 2024, notice was given to Miles & Stockbridge P.C. and Ohana Growth Partners, LLC of a valuation-based resolution opportunity, corresponding to the thirteenth-highest projected outcome as of that date, in the amount of \$213,065,535.11. This communication included an opportunity to negotiate. On October 7, 2024, a revised notice was issued to the same parties indicating an updated thirteenth-highest projected valuation of \$213,100,535.11, along with notification that the value was expected to increase to \$231,366,767.22 following the submission of additional filings. This communication also included an opportunity to negotiate. Upon request to engage in negotiations, an updated valuation can be provided to reflect the projected figure as of the time of discussion.

On October 15, 2024, the Memorandum of Law in Support of Reciprocal Penalties provided notice to Miles & Stockbridge P.C., Ohana Growth Partners, LLC, and the State of Maryland of a proposed framework for

reciprocal equitable relief. That notice included a daily rate of \$2,500—multiplied by the number of persons who contributed to the fraudulent litigation—number of days  $\times$  number of persons, not limited to natural persons, to be calculated at the time of resolution.

On December 27, 2024, the undersigned's federal complaint served as formal notice to the above entities and to the United States Government of the inclusion of consecutive, compounding multiplier-based remedies as a form of equitable relief corresponding to the consecutive and compounding harm alleged.

As of June 10, 2025, the applicable punitive damages multiplier is recorded at 9:1, and this notice informs all parties that the multiplier is scheduled to increase by one (1) unit for every full week of continuing non-resolution, beginning June 16, 2025—10:1, 11:1, 12:1, and so on.

Accordingly, all recipients of this notice are hereby provided an additional formal invitation to engage in negotiations in good faith. Failure to acknowledge or respond to this notice will be construed as a refusal to engage in such negotiations.

All parties have previously received a copy of the original December 27, 2024, complaint in zipped format, along with Form AO 399 – Waiver of Service of Summons, with the exception of the United States Government,

which did not receive the waiver form. A new complaint will be filed in the new venue with additional defendants and claims.

My intentions remain unchanged. I will continue to pursue injunctive relief, summary judgment, and default judgment where appropriate, along with discovery and depositions. I intend to assert the necessary exemptions required to prevent obstruction or obfuscation in both my individual and class representative capacity. All reasonable measures should be taken to ensure the preservation and integrity of a rigorous and complete discovery process.

This notice will be served via email to Ohana Growth Partners, LLC, Miles & Stockbridge P.C., and the State of Maryland. Filing in the United States Court of Appeals for the Fourth Circuit constitutes service upon the United States Government.

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**Respectfully Submitted**

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**June 10, 2025**

/s/ Ryan Dillon-Capps  
**Ryan Dillon-Capps**

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